

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim No.13-10200-GAO
)	
DZHOKHAR A. TSARNAEV,)	<u>FILED UNDER SEAL</u>
Defendant)	

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
EXHIBIT TO ITS OPPOSITION TO DEFENDANT'S
RENEWED MOTION FOR HEARING TO ADDRESS "LEAKS" UNDER SEAL**

The United States of America, by and through its undersigned counsel, respectfully requests leave to file an exhibit to its opposition to defendant's renewed motion for hearing to address "leaks" under seal. The exhibit is the government's detention affidavit in United States v. Stephen Silva, Crim. No. 14-10210-MLW (D. Mass.), which the government never filed or made public. As grounds for this motion, the government states that openly filing the exhibit would disclose information about the evidence in that case (and this case) which, to date, the government has obviated the need to make public.

A copy of the exhibit the government seeks leave to file under seal is attached to this motion.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ William D. Weinreb
WILLIAM D. WEINREB
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Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document will be sent via electronic mail to Judy Clarke, Esq., counsel for Dzhokhar Tsarnaev, on August 8, 2014.

/s/ William D. Weinreb

WILLIAM D. WEINREB